



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ICR/AFM/KCB
F. #2018R01047

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 3, 2021

By Email and ECF

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Kenneth J. Kaplan
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Re: United States v. Jack Cabasso, et al.
Criminal Docket No. 19-CR-582 (DRH)

Dear Counsel:

The government has made available a further production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This production supplements the disclosures of Rule 16 discovery produced to individual defendants on January 14, 2020, and November 18, 2020, and to all defendants on June 24, 2020, July 2, 2020, July 10, 2020, July 31, 2020, September 17, 2020, October 16, 2020, November 24, 2020, December 17, 2020, February 11, 2021, February 19, 2021, July 9, 2021, July 23, 2021 and August 17, 2021. The government renews its request for reciprocal discovery from the defendants.

The materials produced today are subject to the protective order entered in this case on May 29, 2020. They consist of forensic images of electronic devices and storage media seized by the government, and scanned images of paper documents seized by the government.

1. Forensic Images of Electronic Devices and Storage Media

Each forensic image of an electronic device or electronic storage media in today's production is identified below by reference to its "1B" number (a unique identifier assigned by the FBI), as well as the location where it was seized and the Bates number assigned for discovery purposes.

1B Number	Type of Device/Storage Media	Location Seized	Bates Number
5	Desktop computer	Cabasso Residence, Rm. G	AVT_MEDIA_013
53	Desktop computer	Cabasso Residence, Rm. G	AVT_MEDIA_014
65	CD	48 Mall Dr., Rm. J	AVT_MEDIA_015
85	Thumb drive	48 Mall Dr., Rm. A1	AVT_MEDIA_016
102	Laptop computer	48 Mall Dr., Rm. Y	AVT_MEDIA_017
139	Desktop computer	48 Mall Dr., Rm. Y	AVT_MEDIA_018
140	Desktop computer	48 Mall Dr., Rm. Y	AVT_MEDIA_019
144	Laptop computer	48 Mall Dr., Rm. B3	AVT_MEDIA_020
194	Hard drive	48 Mall Dr., Rm. G	AVT_MEDIA_021
204	Thumb drive	48 Mall Dr., Rm. B3	AVT_MEDIA_022
222	Hard drive	48 Mall Dr., Rm. B2	AVT_MEDIA_023
258	Hard drive	48 Mall Dr., Rm. B2	AVT_MEDIA_024
262	CDs	48 Mall Dr., Rm. H	AVT_MEDIA_025
267	Hard drive	48 Mall Dr., Rm. H	AVT_MEDIA_026
268	Hard drive	48 Mall Dr., Rm. H	AVT_MEDIA_027
269	Hard drive	48 Mall Dr., Rm. H	AVT_MEDIA_028
271	Hard drive	48 Mall Dr., Rm. H	AVT_MEDIA_029
272	Hard drive	48 Mall Dr., Rm. H	AVT_MEDIA_030
273	Hard drive	48 Mall Dr., Rm. H	AVT_MEDIA_031
274	Hard drive	48 Mall Dr., Rm. H	AVT_MEDIA_032
278	Laptop computer	48 Mall Dr., Rm. X	AVT_MEDIA_033

This material is available at Dupe Coop and can be obtained by requesting
Production 12.

More information about each device and storage medium is available in the government's production of October 16, 2020; in particular, on that date, a schematic showing letter designations for various spaces within the 48 Mall Drive search warrant location was produced as AVENTURA_0000080667-AVENTURA_0000080667, and a schematic with respect to the Cabasso Residence was produced as AVENTURA_0000080524-AVENTURA_0000080526.

2. Scanned Copies of Paper Documents

Today's production also includes scans of approximately 340,000 pages of paper documents seized by the government. These are produced under the Bates range AVTESI_0004903455-AVTESI_0005244126. In general, the hardcopy document scans in this production are organized together with the other hardcopy documents in the same folder from which they were seized. This material is available at Dupe Coop and can be obtained by requesting Production 11.

3. Further Discovery Productions

As of this date, the government believes it has produced the vast majority of the materials in its possession that are discoverable under Rule 16. In our continuing review of the materials in the government's possession, however, the government has identified additional documents and materials that are arguably discoverable under Rule 16, and we expect to produce those materials over the following weeks. While we anticipate that the following discovery production will substantially complete the government's productions of Rule 16 discovery in this case, the government's discovery obligations are continuing, and should the government identify or come into possession of additional discoverable material, the government will comply with its obligations by making newly identified or obtained materials available in discovery.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

BREON PEACE
United States Attorney

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Enclosures

cc: Clerk of the Court (DRH) (by ECF) (without enclosures)